

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE**

DANIEL LOVELACE and
HELEN LOVELACE, Individually, and as Parents of
BRETT LOVELACE, deceased,

Plaintiffs,

Vs.

No. 2:13-cv-02289 SHL - dkv
JURY TRIAL DEMANDED

PEDIATRIC ANESTHESIOLOGISTS, P.A.;
BABU RAO PAIDIPALLI; and
MARK P. CLEMONS,

Defendants.

DEFENDANT, DR. MARK P. CLEMONS', ADDITIONAL VOIR DIRE QUESTIONS

Comes now the Defendant, Mark Clemons, M.D., and proposes the following additional voir dire questions:

1. If you have ever been a plaintiff or defendant in a lawsuit, tell us about that.
2. If you have ever served on a jury before, tell us a little about that case and whether that experience would affect your ability to be a juror in this case.
3. Have you or any member of your family had any unpleasant experiences with medical treatment rendered by a hospital or doctor?
4. Do you understand that the mere filing of a lawsuit does not mean that the plaintiffs are entitled to recover damages from the defendants?
5. Do you understand that anyone may file a lawsuit against another, but it is your job to judge the facts and apply the law in order to determine the outcome?

6. Have you or any member of your family had training or worked as a healthcare provider?

7. We are dealing with two separate types of defendants – anesthesiology and surgery. Can you separate the two different functions when considering the facts in this case?

8. Can you accept the proposition that there may be differences of opinion as to medical treatment and conditions?

9. Can you decide this case based only upon the evidence that you hear in this courtroom and not anything else?

10. Will you follow the law and instructions given to you by the judge even if you do not agree?

By: s/J. Kimbrough Johnson
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing has been served via U.S. Mail to all counsel of record identified below:

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This 6th day of January, 2015.

s/ J. Kimbrough Johnson
J. KIMBROUGH JOHNSON